

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHUN-KO CHANG, individually and on  
behalf of all others similarly situated,

Plaintiff,

NO.: 7-24-CV-08980

v.

SHEN YUN PERFORMING ARTS, INC.,  
FEI TIAN COLLEGE, FEI TIAN  
ACADEMY OF THE ARTS, DRAGON  
SPRINGS BUDDHIST INC.,  
INTERNATIONAL BANK OF CHICAGO,  
SHUJIA GONG a/k/a TIANLIANG ZHANG,  
HONGZHI LI, and RUI LI,

Defendants.

**MOTION TO APPEAR *PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, I, Michael Dell'Angelo, hereby move this Court for an Order for admission *pro hac vice* to appear as counsel in the above-captioned case on behalf of Plaintiff Shun-Ko Chang.

I am a member in good standing of the bars of the Commonwealth of Pennsylvania and the State of New Jersey. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

I have attached an affidavit as Exhibit A pursuant to Local Rule 1.3. Certificates of Good Standing from the Commonwealth of Pennsylvania and the State of New Jersey are attached as Exhibit B. A proposed Order is attached as Exhibit C.

Dated: November 26, 2024

Respectfully submitted,

/s/ Michael Dell'Angelo

Michael Dell'Angelo

BERGER MONTAGUE

1818 Market Suite, Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-3080

Fax: (215) 875-4604

Email: mdellangelo@bm.net

*Attorney for Plaintiff Chun-Ko Chang*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Michael Dell'Angelo

Michael Dell'Angelo